

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF BENJAMIN  
STEINMETZ FOR AN ORDER TO TAKE  
DISCOVERY FROM VALE S.A., VALE  
AMERICAS, INC., RIO TINTO PLC, AND  
RIO TINTO LIMITED PURSUANT TO 28  
U.S.C. § 1782

Case No. 1:20-mc-00212

**MOTION FOR ADMISSION  
*PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of The United States Courts for the Southern and Eastern Districts of New York, I, Victoria R. Morris, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Benjamin Steinmetz in the above captioned application.

I am in good standing of the bars of the state of Florida and the District of Columbia, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: June 4, 2020

Respectfully Submitted,  
**KOBRE & KIM LLP**

/s/ Victoria R. Morris  
Victoria R. Morris  
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**CERTIFICATE OF SERVICE**

I, Victoria R. Morris, certify that on June 4, 2020, I electronically filed the foregoing motion and accompanying affidavit, Certificates of Good Standing, and proposed Order for Admission *Pro Hac Vice* with the Clerk of Court using the CM/ECF system. Service of this filing shall be made to the entities subject to the discovery application filed on May 21, 2020.

/s/ Victoria R. Morris  
Victoria R. Morris